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2 **IN THE UNITED STATES DISTRICT COURT**  
3 **FOR THE DISTRICT OF MARYLAND**

4 MARYLAND SHALL ISSUE, INC., *et al.*, )  
5 )  
6 *Plaintiffs,* )  
7 )  
8 v. ) Case No. 8:21-cv-01736-TDC (L)  
9 ) Case No. 8:22-cv-01967-DLB  
10 MONTGOMERY COUNTY, MD., )  
11 )  
12 *Defendant.* )

13 **DECLARATION OF ALLAN D. BARALL**

14 COMES NOW, the declarant, ALLAN D. BARALL, and hereby solemnly declares  
15 under penalties of perjury and states that based upon personal knowledge that the contents of the  
16 following declaration are true to the best of my knowledge:

17 1. My name is ALLAN D. BARALL, and I am member of Maryland Shall Issue,  
18 Inc., a plaintiff in the above-captioned matter. I am an adult over the age of 18, a Montgomery  
19 County, Maryland resident and I am fully competent to give sworn testimony in this matter.

20 2. I am a member of my Jewish synagogue in Potomac, and I serve as a volunteer  
21 plain-clothed armed security member of that synagogue located in Montgomery County, Maryland  
22 with the permission of the rabbi and synagogue leadership.

23 3. I chose to obtain my wear and carry handgun permit in 2020 at the request of the  
24 synagogue's rabbi. In addition to myriad notable international Antisemitic incidents that that took  
25 place prior to that year, according to the Anti-Defamation League in 2019 there were 2,107 anti-  
26 Semitic incidents recorded in the United States that year alone. Following the deadly October 2018  
27 armed attack against the Tree of Life – Or L'Simcha Congregation in Pittsburgh, Pennsylvania, in  
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1 2019 there were multiple violent attacks, including: an April 2019 armed attack against Chabad of  
2 Poway synagogue in Poway, California; a December 2019 knife attack against rabbi in Monsey,  
3 New York, and a December 2019 attack in a kosher grocery store in Jersey City, New Jersey. In  
4 addition to service attendees, worshippers, and guests in our synagogue, we also have multiple  
5 priceless Hebrew Torah Scrolls that are adorned with silver. These Torah scrolls are routinely  
6 taken out of their storage for use during religious services, in preparation for upcoming services,  
7 and for frequent adjustment, checking, and repair. In light of all of this, my synagogue's rabbi  
8 requested that I serve as an armed volunteer to enhance our security.  
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10  
11 4. The unfortunate trend of Antisemitism I cite above has only gotten worse  
12 according to publicly available religious bias and hate crimes reports from both the Anti-  
13 Defamation League and the Federal Bureau of Investigation. And, in 2021 while I was walking  
14 along a busy road to my synagogue for Sabbath services on a Saturday morning, the occupant of  
15 a passing car yelled an Antisemitic statement at me.  
16

17 5. By way of background, I am a retired and decorated United States Army colonel.  
18 I faithfully served as an Army military intelligence officer for over 31 years with a security  
19 clearance above Top Secret and with polygraphs. I served in Special Forces and Special  
20 Operations units in Afghanistan and other global locations, in major intelligence organizations, at  
21 the White House on the National Security Council staff, and at the Pentagon on the staff of the  
22 Chairman of the Joint Chiefs of Staff. In one assignment with an Army unit designated to provide  
23 support to United States embassies I routinely qualified with weapons to the same certification  
24 standard as US Department of State Diplomatic Security officers on dynamic ranges.  
25

26 6. In another synagogue that my family and I previously attended, I stood up, led,  
27 and managed a comprehensive security operation. While effective, it was also required a  
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1 significant amount of manpower to staff multiple shifts across Saturday Sabbaths and many  
2 holidays throughout the year alongside paid off-duty and retired law enforcement officers hired by  
3 the synagogue. While the off-duty and/or retired law enforcement officers are professional, they  
4 are also expensive and limited to working very few hours one day per week during the main service  
5 in the morning. However, synagogues hold services and classes almost every day on weekdays,  
6 weekends, and government holidays. Most importantly, the law enforcement officers generally  
7 lacked the innate awareness of Jewish cultural nuances and behaviors that indicate someone just  
8 doesn't belong at the synagogue at that time.

10  
11 7. By its text, Bill 21-22E bans me and others with similar backgrounds,  
12 dispositions, and bona fides from wear and carry of firearms for protection at our synagogue, which  
13 is physically situated close to a road with relatively easy access. Our current wear and carry  
14 permits, granted by the Maryland State Police after background checks, are no longer sufficient  
15 for carry in my synagogue, despite the request of my rabbi, under Montgomery passage of Bill 21-  
16 22E. This exposes my synagogue, its property, and its members and guests – my friends and  
17 neighbors – to the very real risk of not being armed in the fact of an attack, like those I describe  
18 above.

20  
21 8. It is my opinion that the result of Bill 21-22E infringes on my personal right of  
22 self-defense, on the collective rights of my congregation to permit and choose members to be  
23 armed, and creates risk in the face of an attack such as I describe above. It is ironic that my rabbi,  
24 my community, the United States government and United States Armed Forces, and the State of  
25 Maryland trust me to be armed, but Montgomery County does not.

26  
27 9. I hereby declare that the factual allegations in the complaint that relate or refer  
28 to myself and my synagogue are true to the best of my knowledge.

*/s/ Allan D. Barall*

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Dated: December 1, 2022:

ALLAN D. BARALL